

ESTTA Tracking number: **ESTTA613636**

Filing date: **07/03/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	94002588
Party	Applicant Crown Center Redevelopment Corporation
Correspondence Address	DAVID N JOHNSON HALLMARK CARDS INCORPORATED 2501 MCGEE TRAFFICWAY , MD 339 KANSAS CITY, MO 64108-2600 UNITED STATES sara.grabill@hallmark.com, trademark@hallmark.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	David N. Johnson
Filer's e-mail	sara.grabill@hallmark.com
Signature	/david n johnson/
Date	07/03/2014
Attachments	Motion for Suspension.pdf(84379 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Crown Center Redevelopment  
Corporation

Plaintiff,

v.

Cumberland County Commission,  
County Courthouse

Defendant.

Concurrent Use No. 94002588

**JOINT MOTION FOR SUSPENSION**

AND NOW, Crown Center Redevelopment Corporation (hereinafter, "Plaintiff") and Cumberland County, NC (hereinafter, "Defendant") (collectively, the "Parties"), jointly and by and through counsel, hereby move the Trademark Trial and Appeal Board ("Board") as follows:

1. The Parties have executed a Settlement and Coexistence Agreement to resolve their differences relating to this concurrent use proceeding.
2. Contemporaneously with the filing of this Joint Motion for Suspension, Plaintiff is filing with the Board a Motion for Consideration of Coexistence Agreement, Request of Issuance of the Concurrent Use Registrations Sought, and Amendment ("Plaintiff's Motion"), in which Plaintiff requests that this concurrent use proceeding be resolved in accordance with the terms of the Parties' Settlement and Coexistence Agreement.
3. The Parties agree that a suspension of this proceeding pending the Board's consideration and disposition of Plaintiff's Motion would be in the best interest of the Board and both Parties.
4. Pursuant to TMBP Section 510.03, good cause exists for a suspension because Plaintiff's Motion, if granted, would fully resolve this proceeding. Further, this suspension is not sought or

necessitated as a result of either party's lack of diligence or unreasonable delay, but rather has been agreed to by the Parties in furtherance of their mutual desire to resolve all pending issues.

5. Accordingly, the Parties move that this concurrent use proceeding, including all deadlines applicable to each party, be suspended pending the Board's consideration and disposition of Plaintiff's Motion.

Respectfully submitted this 3rd day of July, 2014.

By: 

David N. Johnson  
Hallmark Cards, Incorporated  
Attorney for Plaintiff  
2501 McGee Trafficway, MD 339  
Kansas City, MO 64108-2600  
[davidjohnson@hallmark.com](mailto:davidjohnson@hallmark.com)  
Tel: 1.816.274.5583

By: 

William S. Fultz  
Parker Poe Adams & Bernstein LLP  
Attorney for Defendant  
P.O. Box 389  
Raleigh, NC 27602  
[trademarks@parkerpoe.com](mailto:trademarks@parkerpoe.com)  
Tel: 1.919.828.0564